

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ROSA SANABRIA,
Plaintiff,

V.

LAHEY CLINIC MEDICAL CENTER,
SODEXHO, INC. AND
MICHAEL TALBERT,
Defendants.

Civil Action No: 05-11866 RCL

**JOINT MOTION TO EXTEND TIME FOR DEFENDANTS'
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Now come the parties and hereby request that the Court grant the Defendants an extension of time to respond to the Plaintiff's Complaint. As reason therefore, the parties state that simultaneously with the filing of this Joint Motion, the Plaintiff is filing (1) a Notice of Dismissal of Count I of her Complaint dismissing with prejudice her claim under Title VII, and (2) a Motion to Remand this action to State Court. Given that the Defendants were planning on filing a Motion to Dismiss the Plaintiff's Complaint (including Count I of the Complaint) in this Court, the parties believe that granting this extension will avoid duplicative filings and unnecessary arguments. Therefore, the parties respectfully request that the Court grant the Defendants an extension of time, until ten (10) days after this Court rules on the Plaintiff's

Motion to Remand, to file (or serve on the plaintiff if the action is remanded to state court) a response to the Plaintiff's Complaint.

ROSA SANABRIA

By her attorney,

/s/ Ryan C. Siden

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**LAHEY CLINIC MEDICAL CENTER,
SODEXHO, INC. AND MICHAEL TALBERT**

By their attorney,

/s/ Kenneth J. Martin

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Dated: September 28, 2005